Amendments to the Drawings:

Fig. 1 of the drawings has been amended to add the "PRIOR ART" legend requested by the Examiner

REMARKS

The present invention is a method of user policy management in a communication system and in a policy-based system. The method includes receiving user-entered policies in a user understandable representation capable of translation into a formal executable language; translating the policies from the user-understandable representation into an executable feature language capable of execution by the communication system; translating the policies from the executable feature language into a policy language and detecting common feature interaction errors between the policies; analyzing the feature interaction errors to identify errors that are common to naïve users; reporting the errors that are common to the user in the user-understandable representation; providing the user with a recommendation for correction of the feature interaction errors and re-integration of the policies in the executable feature language; and uploading the policies for execution by the communication system.

The priority document for the above-referenced application is submitted herewith.

An Information Disclosure Statement is submitted for the Examiner's consideration of the prior art referred to in the specification.

Fig. 1 has been labeled "PRIOR ART" as requested by the Examiner in Section 4 of the Office Action.

Claims 1, 10 and 11 have been amended to overcome the lack of antecedent basis.

Claims 1 and 2 stand rejected under 35 U.S.C. §103 as being patentable over U.S. Publication No. 2003/0065942 A1 (Lineman et al) in view of United States Patent 6,327,618 (Ahlstrom et al) in view of United States Patent 6,529,954 (Cookmeyer et al). These grounds of rejection are traversed for the following reasons and newly submitted claims 15 and 16, which correspond to claims 1 and 2, except are drawn to a policy-based system, are patentable for the same reasons.

Claim 1 and claim 15 respectively recite a method of user-policy management in a communication system and a method of user-policy management in a policy-based system. Each claim recites, *inter alia*, receiving user-entered policies in a user-understandable representation capable of translation into a formal executable language; translating said policies from said user-understandable representation into an executable feature language capable of execution by said communications system or said policy-based system; and translating said policies from said executable feature language into a policy language and detecting common feature interaction errors between said policies. This subject matter is not rendered obvious by the proposed combination of Lineman et al, Ahlstrom et al and Cookmeyer et al for the following reasons.

The Examiner has erroneously construed the teachings of Lineman et al to include a disclosure of translating said policies from said executable feature language into a policy language (with the Examiner citing lines 1-8 of paragraph [0037], lines 3-6 of paragraph [0056] with the Examiner concluding that the communication of the XML file to machine-readable code for use by the computer systems may be interpreted as translating the executable feature language into a policy language) and reintegration of said policies in said executable

feature language (with the Examiner reciting lines 3-7 of paragraph [0035], lines 8-13 of paragraph [0057] with the Examiner concluding that the contents of the XML file, the policy, had to be communicated as machine-readable code, policy language, between computer systems across the network and subsequently, reintegrated into an XM file on the receiving side, the user-end of the network, thus may be interpreted as re-integrating the policy into an executable feature language). These interpretations are incorrect for the following reasons.

Fig. 2 of Lineman et al illustrates a flowchart showing steps for actively managing security policies for computer systems and users in which a security policy document 74 is represented both in a human readable form 75 and in a machine readable form 76. The human-readable form contains security guidelines reflecting the security policies which guidelines address behavior of the users 54 in the network and preferably are represented by a structured data representation technique known as Extensible Mark-up Language (XML). See paragraph [0053] of Lineman et al. It is therefore seen that the human-readable from 75 of the security policy document is also available in a machine readable form capable of execution by the communications system and provides uploading the policy for execution by the communication system as provides by steps 90-98. However, there is clearly no teaching of the claimed second translating step of "translating said policies from said executable feature language into a policy language and detecting common feature interaction errors between said policies".

The Examiner has relied upon lines 1-8 of paragraph [0037] and lines 3-6, of paragraph [0056] as teaching this subject matter. However, the Examiner cannot point to anything in paragraphs [0037] and [0056] which describes or suggests the

further translation. The policy document data element 202 includes data elements 204-216 for communicating the security policy document to users in the network. Moreover, element 202 contains data elements 218-226 for implementing the security policy on computer systems in the network. The distributed security policy step 78 in Fig. 2 breaks the document into a block 80, which is distributed to users, and the aforementioned block 90 which is distributed to the computer systems. The respective blocks 80 and 90 are not subject to any further translations which could be argued to meet the second translating step of claims 1 and 15.

It is submitted that Lineman et al at most disclose the first translation as recited in independent claims 1 and 15. As may be seen from paragraphs [0037] and [0056], there is no further translation.

Moreover, since Lineman et al do not disclose the second translation step, there is no counterpart in Lineman et al of the subsequent providing the user with a recommendation for correction of said feature interaction errors and re-integration of said policies in said executable feature language. Lineman et al rely exclusively upon the policy document in an XML format having human-readable and machine-readable data elements with the XML document being communicated across the network via steps 90-98 without any translation into machine readable code or re-integration from machine-readable code to XML. The XML document containing machine-readable data elements which is communicated between computers in the network as represented by steps 90-98 makes unnecessary a re-integration of the policies in said executable feature language.

Neither Ahlstrom et al or Cookmeyer et al cure the deficiencies noted above with respect to Lineman et al.

The Examiner acknowledges that "Lineman and Ahlstrom do not disclose providing the user with a recommendation for correction of said feature indication errors" with the Examiner relying upon lines 5-9 and 16-25 of column 23 of Cookmeyer et al. However, it is submitted that Cookmeyer et al do not disclose this subject matter.

It is noted that Cookmeyer et al pertain to "protocol analysis of signal networks, and more particularly, to knowledge base systems for performing such analysis" as disclosed in the technical field in column 1. It is submitted that the Examiner's citation of lines 25-27 of Cookmeyer et al in column 23 which merely states: "[i]f the user is unable to solve the problem, the expert system offers them several additional recommendations to improve the analysis" does not render obvious the claimed recommendation for connection of feature indication errors. If the Examiner persists in these grounds of rejection, it is requested that he explain on the record how Cookmeyer et al render obvious the feature correction error in view of the foregoing analysis.

Moreover, the Examiner has not demonstrated why a person of ordinary skill in the art would combine the teachings of Lineman et al, Ahlstrom et al and Cookmeyer et al, without impermissible hindsight. The technical fields of art relied upon by the Examiner are diverse and, it is submitted that a person of ordinary skill in the art would not consider such a combination without hindsight.

Moreover, if the proposed combination were made, the second translation step and the re-integration would not result from Lineman et al not disclosing these elements and Ahlstrom et al and Cookmeyer et al not supplying the deficiency thereof.

Furthermore, claim 3 stands rejected under 35 U.S.C. §103 as being unpatentable over Lineman et al, Ahlstrom et al and Cookmeyer et al further in view of United States Patent 6,940,847 (Glitho et al); claim 4 stands rejected under 35 U.S.C. §103 as being unpatentable over Ahlstrom et al and Cookmeyer et al further in view of the Gorse publication; claim 5 stands rejected under 35 U.S.C. §103 as being unpatentable over Lineman et al, Ahlstrom et al and Cookmeyer et al further in view of U.S. Publication No. 2002/0284535 (Moaven) in view of U.S. Publication No. 2002/0198892 (Rychel et al); claim 6 stands rejected under 35 U.S.C. §103 over Lineman et al, Ahlstrom et al and Cookmeyer et al, further in view of U.S. Publication No. 2002/0103895 (Chiang); claim 7 stands rejected under 35 U.S.C. §103 as being unpatentable over Lineman et al, Ahlstrom et al, Cookmeyer et al and Chiang, further in view of United States Patent 6,484,261 (Wiegel); and claims 8-14 stand rejected under 35 U.S.C. §103 as being unpatentable over Lineman et al, Ahlstrom et al, Cookmeyer et al, Chiang and Wiegel, further in vie of United States Patent 6,880,005 (Bell et al). These grounds of rejection are traversed for the same reasons set forth above. None of the references cited in the rejection of claims 3-14 cure the deficiencies noted above with respect to Lineman et al, Ahlstrom et al and Cookmeyer et al.

The drawings have been amended to add the "PRIOR ART" legend requested by the Examiner and furthermore, the specification has been amended to improve its form for reexamination.

The Certified Copy of the Priority document is also being submitted on even date herewith by hand delivery to the U.S. PTO and not by electronic filing.

In view of the foregoing amendments and remarks, it is submitted that each of the claims in the application is in condition for allowance. Accordingly, early allowance thereof is respectfully requested.

To the extent necessary, Applicants petition for an extension of time under 37 C.F.R. §1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 01-2135 (1375.43183X00) and please credit any excess fees to such Deposit Account.

Respectfully submitted,

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Attachments

DES:dlh